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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF GOOGLE LLC'S
SUBMISSION RE: P23 IN RESPONSE
TO DKT. 450-1**

Referral: Hon. Susan van Keulen

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. Attached hereto as Exhibit A is a true and correct copy of GOOG-BRWN-00023909,
7 produced on February 4, 2021.

8
9 I declare under penalty of perjury of the laws of the United States that the foregoing is true
10 and correct. Executed in San Francisco, California on March 2, 2022.

11
12 DATED: March 2, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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15 By /s/ Jonathan Tse
Jonathan Tse

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17 *Attorney for Defendant*
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